



Growing Together,
Learning for Life

Administrative Center

111 East North Street
Eureka, MO 63025-1229

636.938.2232 / 938.2233
636.938.2251 Fax
coadw@rockwood.k12.mo.us

Steve Wester
Purchasing Coordinator

DOCKET FILE COPY ORIGINAL

Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

In the matter of: Request for Review by Rockwood School District of Decision of Universal Service Administrator

Reference: (a) FCC Docket Nos. 97-21 and 96-45
(b) 471 Application Number 136284

Enclosures: (1) Original 471 Application 136284 with Attachments
(2) Appeal Letter Submitted to Universal Service Administrator
(3) USAC Appeal Decision Letter

This letter is a formal request for appeal of the original funding decision made by the Universal Service Administrator dated August 10, 1999 and the Administrator's Decision on Appeal dated March 22, 2000 both of which denied funding for our reference (b) 471 application.

The Universal Service Administrator denied funding on the original application because "30% or more of the FRN includes a request for phones, which are ineligible products based on program rules." This was not true. Our application and associated Appendix 17 was for the monthly service only.

Our appeal to the Universal Service Administrator was denied because "more than 30% of this request is for cellular service to be used by grounds/maintenance, resource officers, computer center, and food services which are ineligible uses of this service according to program rules". Based on this appeal decision I contacted the Universal Service Administrator and inquired where the "30%" statement can be found. They could not direct me to the program rule where this is stated.

No. of Copies rec'd 0
List ABCDE

According to the Schools and Libraries Eligibility List CC Docket No. 96-45, page 3 lists Cellular Service as an Eligible Service when "provided for use at a place of instruction and for educational purposes. The service is not eligible when provided for such uses as security on school buses". The cellular phone service for our schools and the resource officers located at several of our school's, is for educational purposes. The resource officers are both security and educational tools for our students. They conduct safety training and assistance and also provide the school with a safety presence.

Our intent was not to seek funding on the ineligible services for our computer center, grounds/maintenance and food service, but to provide the School's and Libraries Corporation the information on our eligible and ineligible services.

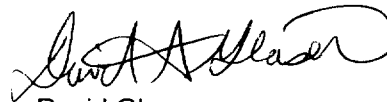
Rockwood School District thereby requests that Erate funding be approved for the cellular service associated with the Nextel phones for our 29 schools (\$40/month x 12 mos.) and 6 resource officers (\$45/month x 12 mos.) for a total funding decision of \$6,864.00 based on our 40% discount status.

I have attached a copy of our original 471 application and the recent denied appeal received from the USAC. Please contact Steve Wester at 636.938.2232 if you have any questions concerning this request for appeal.

Sincerely,



Steve Wester
Purchasing Coordinator



David Glaser
Chief Financial Officer

471

Schools and Libraries Universal Service Services Ordered and Certification Form

Estimated Average Burden Hours Per Response: 6 hours

This form asks schools and libraries to list the eligible telecommunications-related services they have ordered and estimate the annual charges for them so that the Schools and Libraries Corporation can set aside sufficient support to reimburse providers for services.

Please read instructions before completing. (To be completed by each Billed Entity)

Block 1: Applicant Address and Identifications (School, library, or consortium desiring Universal Service funding.)

| | | | |
|---|-------------|--|--|
| 1. Name of Applicant (Billed Entity) | | 2. Funding Year July 1, 1999 - June 30, 2000 | |
| 3a. NCES School Code (if individual school) or NCES Library Code (if individual library) | | | |
| 3b. 471 Application Number (Administrator will insert this) | | 3c. Billed Entity Number 136875 | |
| 4a. Type of Applicant (Check only one box.) <input type="checkbox"/> school <input checked="" type="checkbox"/> school district <input type="checkbox"/> library or library consortium under the LSTA <input type="checkbox"/> consortium of multiple entities | | 4b. If applicant is a consortium, check all other boxes that apply: <input type="checkbox"/> includes non-governmental entities ineligible for support <input type="checkbox"/> region of a state <input type="checkbox"/> statewide <input type="checkbox"/> multi-state <input type="checkbox"/> state educational agency <input type="checkbox"/> local educational agency <input type="checkbox"/> educational service agency | |
| 5. Applicant's Street Address, P.O. Box, or Route Number 111 East North Street | | | |
| City Eureka | State MO | Zip Code 63025 | Telephone Number 314-938-2200 E-mail Address coadw@rockwood.k12.mo.us |
| 6. Contact Person's Name Steve Wester | | | |

Street Address, P.O. Box, or Route Number (if different from Item 5)

| | | |
|--|-------|----------|
| City | State | Zip Code |
| | | |
| Fill in all of the following (if available), and check the preferred mode of contact: <input type="checkbox"/> Telephone 314-938-2232 <input type="checkbox"/> FAX 314-938-2251 <input checked="" type="checkbox"/> E-mail coadw@rockwood.k12.mo.us <input type="checkbox"/> Mail | | |

Block 2: Purpose of Request

| |
|--|
| 7. Purpose of Request: (Check all that apply, if any.) |
| a. <input type="checkbox"/> Discount on contract(s) signed prior to a request being posted on the Administrator's website. Was an FCC Form 470 filed with regard to all the contract(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No |
| b. <input checked="" type="checkbox"/> Discount on contract(s) signed after a request being posted on the Administrator's website. |
| c. <input type="checkbox"/> Minor modification or supplement to existing contract(s) for which a Form 471 was already filed. 471 Application Number _____ |

Block 3: Characteristics of Applicant and Applicant's Service Order (derived from FCC Form 470 Blocks 2 & 3)

| | |
|---|--|
| 8a. Number of students 20,598 | 8b. Number of library patrons n/a |
| 9. Number of buildings to be served 30 | 10. Number of rooms to be served 1253 |

Contact Person's Name Steve Wester and Phone Number 314-938-2232

| | Existing Service | Total Services After Order |
|--|------------------|----------------------------|
| 11. Telecommunications Services | | |
| a. Number of phones that have or require service (See instructions concerning extension phones and fax machines.) | 0 | 62 |
| b. Number of computers that have or require service | | |
| c. Number of high bandwidth video conferencing links | | |
| 12. Internal Connections | | |
| a. Number of buildings with at least some rooms connected | | |
| b. Number of rooms connected | | |
| c. Highest speed of connection | | |
| 13. Internet Access | | |
| a. Number of dial up connections | | |
| b. Highest speed of such dial up connections | | |
| c. Number of direct connections | | |
| d. Highest speed of such direct connections | | |

Block 4: Determining Discount Percentage

14. Fill in one line per school, library, or library consortium and calculate in the last line, an average discount rate for the billed entity. Attach additional pages if necessary. *Note:* If the applicant has already completed this chart for all of the same entities with data that is current, provide the "471 Application Number" (Item 3b), from that previous FCC Form 471 here: _____

| (1) Name of Individual School or Library | (2) NCES or Comparable Code for School or Library (Obtain from Administrator) | (3) Urban or Rural | (4) <i>For Schools:</i> Number of Students <i>For Libraries:</i> NCES Code of a School in its District | (5) <i>For Schools:</i> Number of Students Eligible for National School Lunch Program | (6) Discount Calculated from Discount Matrix | (7) Check if School or Library will use "Shared Services" listed in Item 15. |
|---|--|-----------------------|--|---|---|---|
| Eureka H.S. | | Urban | 1120 | 150 | 40% | <input checked="" type="checkbox"/> |
| Lafayette H.S. | | Urban | 1927 | 211 | 40% | <input checked="" type="checkbox"/> |
| Marquette H.S. | | Urban | 1897 | 269 | 40% | <input checked="" type="checkbox"/> |
| Rockwood Summit H.S. | | Urban | 1336 | 220 | 40% | <input checked="" type="checkbox"/> |
| Crestview M.S. | | Urban | 1050 | 205 | 50% | <input checked="" type="checkbox"/> |
| LaSalle Springs M.S. | | Urban | 944 | 155 | 40% | <input checked="" type="checkbox"/> |
| FOR SHARED SERVICES ORDERED BY BILLED ENTITY (attach worksheet of calculations) | | | | | | |

Contact Person's Name Steve Wester and Phone Number 214-936-2232

Block 5: Services Ordered

15. "Shared" services: All EXCEPT site-specific, internal connections and dedicated ("private line") connections from only one school or library to an ISP or other end-user.

| (1) | (2) | CONTRACT | | | (6) | (7) | Amount | | | (11) |
|--|--|--|-------------------|------------------------|-------------------------------|--------------------|---|--|---|------------------------------------|
| SLC Service Provider Number or Full Legal Name of Service Provider | Universal Service Control Number for Form 470 on which this is based | (3) Contract Number (if applicable) | (4) Award Date | (5) Expiration Date | Services or Products | Service Start Date | (8) Estimated One Time Pre-discount Cost | (9) Estimated Monthly Pre-discount Cost | (10) Estimated Total Annual Prediscount Cost | Percentage Discount (from Item 14) |
| 143000893 | 717780000121014 | T | T | T | Telecommunication Services | 7/1/99 | n/a | 2,897 | 34,764 | 40% |
| | | | | | Internet Access | | | | | |
| | | | | | Internal Connections (Shared) | | | | | |
| | | | | | Telecommunication Services | | | | | |
| | | | | | Internet Access | | | | | |
| | | | | | Internal Connections (Shared) | | | | | |
| | | | | | Telecommunication Services | | | | | |
| | | | | | Internet Access | | | | | |
| | | | | | Internal Connections (Shared) | | | | | |

Contact Person's Name Steve Westerand Phone Number 314-936-2232

16. "Site Specific" Services: Internal connections not shared by multiple schools or libraries and dedicated ("private line") connections from only one school or library to an ISP or other end-user.

| (1) | (2) | CONTRACT | | | (6) | (7) | Amount (See instructions about rounding) | | | (11) | (12) |
|--|--|--|-------------------|------------------------|----------------------|--------------------|---|--|--|--------------------------------------|---|
| SLC Number of Service Provider (Obtain from Service Provider) | Universal Service Control Number for Form 470 on which this is based | (3) Contract Number (if applicable) | (4) Award Date | (5) Expiration Date | Services or Products | Service Start Date | (8) Estimated One Time Pre-discount Cost | (9) Estimated Monthly Pre-discount Cost | (10) Estimated Total Annual Pre-discount Cost | Percent-age Dis-count (from Item 14) | School or Library Code (Listed on website) |
| | | | | | Dedicated Services | | | | | | |
| | | | | | Internal Connections | | | | | | |
| | | | | | Dedicated Services | | | | | | |
| | | | | | Internal Connections | | | | | | |
| | | | | | Dedicated Services | | | | | | |
| | | | | | Internal Connections | | | | | | |
| | | | | | Dedicated Services | | | | | | |
| | | | | | Internal Connections | | | | | | |
| | | | | | Dedicated Services | | | | | | |
| | | | | | Internal Connections | | | | | | |

Contact Person's Name Steve Wester and Phone Number 314-938-2232

17. ☒ Check this box to confirm that, for each service provider listed in 15 and 16, above, a list is attached (as an appendix to this form) of all of the services that each service provider is providing to the billed entity. Service providers should provide these lists on request.

18. a. Total dollars of support allocated for this application for the entire funding year (calculated by administrator)

b. Amount of support set aside for this application for the first six months of the year (calculated by administrator)

19. Provide the total estimated cost (pre-discount price) for the services you expect to order in the funding year following the one for which you are applying here. (This figure is not binding) **\$34,000**

20. Is your order solely for basic telephone service? ☒ Yes ☐ No

Block 6: Certifications and Signature

21. The applicant is eligible for support because it includes: (Check one or both.)

- a. ☒ schools under the statutory definitions of elementary and secondary schools found in the Elementary and Secondary Education Act of 1965, 20 U.S.C. Secs. 8801(14) and (25), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million; and/or
- b. ☐ libraries or library consortia eligible for assistance from a state library administrative agency under the Library Services and Technology Act of 1996 that do not operate as for-profit businesses and whose budgets are completely separate from any schools, including, but not limited to, elementary and secondary schools, colleges, or universities.

22. The school(s) or library(ies) I represent have secured access to all of the resources, including computers, training, software, maintenance, and electrical connections necessary to make effective use of the services purchased as well as to pay the discounted charges for eligible services.

23. All of the individual schools, libraries, and library consortia listed above in items 15 and 16 are covered by:

- a. ☒ an individual; and/or
- b. ☒ higher-level technology plan(s) for using the services requested in this application (if those services consist of other than voice services).

24. Status of technology plans (check one):

- a. ☒ Technology plan(s) has/have been approved; or
- b. ☐ Technology plan(s) will be approved by a state or other authorized body; or
- c. ☐ Technology plan(s) will be submitted to Schools and Libraries Corporation for approval.

25. I certify that the entities eligible for support that I am representing have complied with all applicable state and local laws regarding procurements of services for which support is being sought.

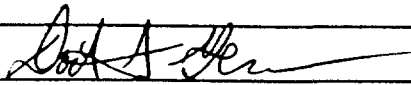
26. I certify that the services the applicant purchases at discounts provided by 47 U.S.C. Sec. 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value.

27. I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service receive an appropriate share of benefits from those services.

28. I recognize that I may be audited pursuant to this application and will retain for five years any and all worksheets and other records that I rely upon to fill out this application.

29. I certify that I am authorized to submit this request on behalf of the above-named institution, that I have examined this request, and to the best of my knowledge, information, and belief, all statements of fact contained herein are true.

30. Signature



31. Date 3/24/99

32. Printed name of authorized person David Glaser

33. Title or position of authorized person Chief Financial Officer

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

Contact Person's Name Steve Wester and Phone Number 314-938-2232

NOTICE TO INDIVIDUALS Section 54.504 of the Federal Communication Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to file this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the competitive bidding requirement contained in 47 C.F.R. § 54.504. All schools and libraries planning to order services eligible for universal service discounts must file this form themselves or as part of a consortium.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this form. We will use the information you provide to determine whether approving this application is in the public interest. If we believe there may be a violation of potential violation of a FCC statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your application may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party of a proceeding before the body or has an interest in the proceeding.

If you owe a past due debt to the federal government, the taxpayer identification number (such as your social security number) and other information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other federal agencies and or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized.

With the exception of your social security number, if you do not provide the information we request on the form, the FCC may delay processing of your application or may return your application without action.

The foregoing Notice is required by the Privacy Act of 1974, Pub. L. No. 93-579, December 31, 1974, 5 U.S.C. § 552, and the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, *et seq.*

Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, D.C. 20554..

This form should be submitted to:

**SLC-Form 471
P.O. Box 7026
Lawrence, Kansas 66044-7026
1-888-203-8100**

If sent by express delivery services or U.S. Postal Service, Return Receipt Requested, the form should be mailed to:

**SLC-Form 471
c/o Ms. Smith
3833 Greenway Drive
Lawrence, Kansas 66046
1-888-203-8100**

USF Form 471

Block 4: Continued

| (1) | (2) | (3) | (4) | (5) | (6) | (7) |
|--|-----------|-------------|-----------------|--------------------------------------|------------|------------------------------------|
| Name of Individual School | NCES Code | Urban/Rural | No. of students | No. of Students Elig. for Free Lunch | Discount | Check if school using shared svcs. |
| Rockwood South M.S. | | Urban | 1006 | 223 | 50% | x |
| Rockwood Valley M.S. | | Urban | 1090 | 98 | 40% | x |
| Selvidge M.S. | | Urban | 984 | 214 | 50% | x |
| Babler Elem. | | Urban | 727 | 70 | 40% | x |
| Ballwin Elem. | | Urban | 552 | 91 | 40% | x |
| Blevin's Elem. | | Urban | Opening Fall 99 | Opening Fall 99 | 40% | x |
| Bowles Elem. | | Urban | 434 | 93 | 50% | x |
| Center for Creative Learning | | Urban | 889 | 0 | 20% | x |
| Chesterfield Elem. | | Urban | 543 | 64 | 40% | x |
| Ellisville Elem. | | Urban | 523 | 77 | 40% | x |
| Eureka Elem. | | Urban | 502 | 71 | 40% | x |
| Geggie Elem. | | Urban | 442 | 74 | 40% | x |
| Green Pines Elem. | | Urban | 690 | 58 | 40% | x |
| Individualized Learning Ctr | | Urban | 44 | 0 | 20% | x |
| Kehrs Mill Elem. | | Urban | 604 | 70 | 40% | x |
| Kellison Elem. | | Urban | 511 | 130 | 50% | x |
| Pond Elem. | | Urban | 588 | 44 | 40% | x |
| Ridge Meadows Elem. | | Urban | 570 | 52 | 40% | x |
| Stanton Elem. | | Urban | 291 | 49 | 50% | x |
| Uthoff Valley Elem. | | Urban | 621 | 111 | 40% | x |
| Kindergarten Center | | Urban | 170 | 0 | 20% | x |
| Westridge Elem. | | Urban | 549 | 87 | 50% | x |
| Wild Horse Elem. | | Urban | 475 | 56 | 40% | x |
| Woerther Elem. | | Urban | 622 | 79 | 40% | x |
| Average Discount Rate for Billed Entity | | | | | 40% | |

Rockwood R-6 School District Calculation of Discount Rate

| Calculation of Discount Rate | | | | | |
|--|--------------------|--|---|------------------|-----------|
| | No. of Students | No. of Students Eligible for Free Lunch | % of Students Eligible for Free Lunch | Discount Rate | Step 2 |
| Eureka H.S. | 1120 | 150 | 13.39% | 40% | 448 |
| Lafayette H.S. | 1927 | 211 | 10.95% | 40% | 770.8 |
| Marquette H.S. | 1897 | 269 | 14.18% | 40% | 758.8 |
| Rockwood Summit H.S. | 1336 | 220 | 16.47% | 40% | 534.4 |
| Crestview M.S. | 1050 | 205 | 19.52% | 50% | 525 |
| LaSalle Springs M.S. | 944 | 155 | 16.42% | 40% | 377.6 |
| Rockwood South M.S. | 1006 | 223 | 22.17% | 50% | 503 |
| Rockwood Valley M.S. | 1090 | 98 | 8.99% | 40% | 436 |
| Selvidge M.S. | 984 | 214 | 21.75% | 50% | 492 |
| Babler Elem. | 727 | 70 | 9.63% | 40% | 290.8 |
| Ballwin Elem. | 552 | 91 | 16.49% | 40% | 220.8 |
| Blevin's Elem. | Opening Fall 99 | Opening Fall 99 | 0.00% | 40% | 0 |
| Bowles Elem. | 434 | 93 | 21.43% | 50% | 217 |
| Center for Creative Learning | 889 | 0 | 0.00% | 40% | 355.6 |
| Chesterfield Elem. | 543 | 64 | 11.79% | 40% | 217.2 |
| Ellisville Elem. | 523 | 77 | 14.72% | 40% | 209.2 |
| Eureka Elem. | 502 | 71 | 14.14% | 40% | 200.8 |
| Geggie Elem. | 442 | 74 | 16.74% | 40% | 176.8 |
| Green Pines Elem. | 690 | 58 | 8.41% | 40% | 276 |
| Individualized Learning Ctr | 44 | 0 | 0.00% | 40% | 17.6 |
| Lehrs Mill Elem. | 604 | 70 | 11.59% | 40% | 241.6 |
| Kellison Elem. | 511 | 130 | 25.44% | 50% | 255.5 |
| Pond Elem. | 588 | 44 | 7.48% | 40% | 235.2 |
| Ridge Meadows Elem. | 570 | 52 | 9.12% | 40% | 228 |
| Stanton Elem. | 291 | 49 | 16.84% | 50% | 145.5 |
| Uthoff Valley Elem. | 621 | 111 | 17.87% | 40% | 248.4 |
| Kindergarten Center | 170 | 0 | 0.00% | 40% | 68 |
| Westridge Elem. | 549 | 87 | 15.85% | 50% | 274.5 |
| Wild Horse Elem. | 475 | 56 | 11.79% | 40% | 190 |
| Woerther Elem. | 622 | 79 | 12.70% | 40% | 248.8 |
| Total Students in District Dec-98 | 20,598 | Step 3 Total | 9162.9 | | |
| | | Step 4 Total | 44.48% | | |
| | | (Discount rate for shared services for the District.) | | | |

NEXTEL PHONES

| | | Monthly | Annual |
|-------|------------------------------------|----------|--------------|
| Qty. | Description | Service | Service |
| 6 | Nextel Phones (Resource Officers) | \$ 45.00 | \$ 3,240.00 |
| 4 | Nextel Phones (Crisis Team) | \$ 59.00 | \$ 2,832.00 |
| 29 | Nextel Phones (Schools) | \$ 40.00 | \$ 13,920.00 |
| 3 | Nextel Phones (Computer Ctr) | \$ 59.00 | \$ 2,124.00 |
| 11 | Nextel Phones (Grounds/Maint.) | \$ 59.00 | \$ 7,788.00 |
| 9 | Nextel Phones (Food Service/Wrhse) | \$ 45.00 | \$ 4,860.00 |
| | | | |
| Total | | | \$ 34,764.00 |



Growing Together,
Learning for Life

Administrative Center

111 East North Street
Eureka, MO 63025-1229

(636) 938-2232 / 938-2233

(636) 938-2251 Fax

coadw@rockwood.k12.mo.us

Steve Wester

Purchasing Coordinator

Letter of Appeal
Schools and Libraries Division
Box 125 – Correspondence Unit
100 South Jefferson Road
Whippany, NJ 07981

Subject: Appeal of Funding Decision for Form 471 Application Number 136284

Reference: (a) Erate Funding Decision Letter dated August 10, 1999
(b) Form 471 application 136284

This letter is a formal request for appeal of the funding decision made on your reference (a) letter. The funding commitment decision explanation given on page five of your letter states that we were denied funding because "30% or more of this FRN includes a request for phones, which are ineligible products based on program rules."

I have enclosed an additional copy of the reference (b) application for your review. Please note our Appendix 17 List of Services provides the quantity and monthly service charges only. Our district's Estimated Total Annual Pre-discount Cost (block 5, paragraph 15, column 10) was derived from the Annual Service Charges on Appendix 17. The prices of the phones were not submitted as part of our funding application.

Your consideration of this appeal is appreciated.

If you have any questions please contact Steve Wester at (636)938-2232.

Sincerely,

Steve Wester
Purchasing Coordinator

David Glaser
Chief Financial Officer

USAC
UNIVERSAL SERVICE
ADMINISTRATIVE CO.

SCHOOLS AND LIBRARIES DIVISION
Box 125 - Correspondence Unit
100 South Jefferson Road
Whippany, NJ 07981

ROCKWOOD SCHOOL DISTRICT R 6
STEVEN WESTER
111 E NORTH ST
EUREKA MO 63025-1229

August 10, 1999

Re: Form 471 Application Number: 136284
Funding Year: 07/01/1999 - 06/30/2000
Billed Entity Number: 136875

Thank you for your 1999-2000 E-rate application and for any assistance you provided throughout our review. We have completed processing of your Form 471. This letter is to advise you of our decisions.

FUNDING COMMITMENT REPORT

From your Form 471, we reviewed row-by-row discount requests in Items 15 and 16. We assigned each row a Funding Request Number (FRN). On the pages following this letter, we have provided a Funding Commitment Report for each FRN in your application.

Attached to this letter you will find a guide that defines each line of the Funding Commitment Report and a complete list of FRNs from your application. The SLD is also sending this information to your service provider(s) so arrangements can be made to begin implementing your E-rate discount(s). We would encourage you to contact your service providers to let them know your plans regarding these services.

FOR QUESTIONS

If you have questions regarding our decisions on your E-rate application, please notify us in writing. Your questions should be sent to: Questions, Schools and Libraries Division, Universal Service Administrative Company, Box 125 - Correspondence Unit, 100 South Jefferson Road, Whippany, NJ 07981.

FOR APPEALS

If you wish to appeal to the SLD, your appeal must be made in writing and received by us within 30 days of issuance of this letter as indicated by its postmark. In your letter of appeal, please include: correct contact information for the appellant, information on the Funding Commitment Decision you are appealing and the specific Funding Request Number in question, and an original authorized signature. Appeals sent by fax, e-mail or phone call cannot be processed. Please mail your appeal to: Letter of Appeal, Schools and Libraries Division, Box 125 - Correspondence Unit, 100 South Jefferson Road, Whippany, NJ 07981. You may also call our Client Service Bureau at 888-203-8100. While we encourage you to resolve your appeal with the SLD first, you have the option of filing an appeal directly with the Federal Communications Commission (FCC): FCC, Office of the Secretary, 445 12th Street SW, Room TW-A 325, Washington, D.C. 20554.

NEXT STEPS

Once you have reviewed this letter and have determined that some or all of your requests have been funded, your next step is to complete and submit the enclosed FCC Form 486. This Form notifies the SLD that you are currently receiving or have begun receiving services approved for discounts and provides certified indication that your technology plan(s) has been approved. As you complete your Form 486, you should also contact your service provider to verify they have received notice from the SLD of your commitments. After the SLD processes your Form 486, we can begin processing invoices from your service provider(s) so they can be reimbursed for discounted services they have provided you. For further detailed information on next steps, please review all enclosures.

POST-COMMITMENT REMINDER

We would like to remind you that all approved applicants are subject to post-funding commitment audits and other reviews by the SLD to assure that the discounts are being used in compliance with the program rules. Any applicant that is found to have violated program rules will be subject to enforcement activities and other means of recourse by the SLD and other appropriate Federal, State and local authorities.

We look forward to continuing our work with you on connecting our schools and libraries together through communications.

Sincerely,
Kate L. Moore
President, Schools and Libraries Division, USAC

Enclosures

EXPLANATION OF A FUNDING COMMITMENT REPORT

Attached to this letter will be a report for each approved E-rate funding request from your application. We are providing the following definitions.

- * **FUNDING REQUEST NUMBER (FRN):** A Funding Request Number is assigned by the SLD to each line completed in Items 15 and 16 of your Form 471 once an application has been processed. This number is used to report to applicants and vendors the status of individual discount requests submitted on a Form 471. Applicants and vendors learned about FRNs when they received their Receipt Acknowledgement Letter and must use these numbers when completing the Form 486 and Invoices. An FRN will never be longer than 10 digits. If a FRN is shorter than 10 digits, applicants are advised to add zeroes to the front of the numbers to reach 10 digits when filing post-commitment forms.
- * **FUNDING STATUS:** Each FRN will have one of six definitions: "Funded", "Denied", "Partially Funded", "Funds Exhausted", "Unfunded", or "As Yet Unfunded". An FRN that is "Funded" will be approved at the level that SLD determined is appropriate for that item. That will generally be the level requested by you unless the SLD determines during the application review process that some adjustment is appropriate, for example, a different discount percentage for that FRN than the Form 471 featured. A "Denied" FRN is one for which no funds will be committed, and the reason for that decision will be briefly explained in the "Funding Commitment Decision", and amplification of that explanation may be offered in the section, "Funding Commitment Decision Explanation". In accordance with FCC program rules, FRNs are "Partially Funded" or "Unfunded", if the total amount of funds in the Universal Service Fund is insufficient to fully fund or fund all approved requests. If the Form 471 was received after all the funds in the Universal Service Fund were allocated and it was processed, the status will indicate "Unfunded - Funds Exhausted". "As Yet Unfunded" is a temporary status that would be assigned to an FRN when the SLD is uncertain at the time the letter is generated whether there will be sufficient funds to make commitments for a particular service type at a particular discount level. For example, if your application included both telecommunications services and internal connections, you might receive a letter with our funding commitment for your telecommunications requests and a message that your internal connections requests are "As Yet Unfunded". You would then receive a later letter regarding our funding decision on your internal connections requests.
- * **SPIN (Service Provider Identification Number):** A unique number assigned by the Universal Service Administrative Company to vendors seeking payment from the Universal Service Fund for participating in the universal service support programs. A SPIN contains 9 digits and should be included by applicants on their completed Form 471 applications. A SPIN is also used to verify delivery of services and to arrange for payment.
- * **SERVICE PROVIDER NAME:** The legal name of the service provider.
- * **PROVIDER CONTRACT NUMBER:** The number of the contract between the eligible party and the service provider. This will be present only if a contract number was provided on Form 471.
- * **SERVICES ORDERED:** The type of service ordered from the service provider, as shown on Form 471.
- * **EARLIEST POSSIBLE EFFECTIVE DATE OF DISCOUNT:** The first possible date of service for which the SLD will reimburse service providers for the discounts for the service. Note: If the actual service start date provided on a Form 486 is later than this date, the actual service start date set forth in the Form 486 will be the effective date of the discount.
- * **CONTRACT EXPIRATION DATE:** The date the contract expires. This will be present only if a contract expiration date was provided on Form 471. This is not applicable for tariff services.
- * **SITE IDENTIFIER:** This will appear only for FRNs listed in Item 16 of your Form 471. For public schools, the 12-digit NCES code you listed in Item 14 for this school site will appear here. If there is no NCES Code for an FRN in Item 16, the SLD-assigned entity number will appear here.
- * **PRE-DISCOUNT COST:** Amount in Column 10 of Item 15/16, Form 471, as determined through the application review process. Please note that, during the Problem Resolution process at SLD, the amount in Col. 10 of Item 15/16 may have been corrected to conform to the information provided about Service Start Date and

Monthly Costs.

- * DISCOUNT PERCENTAGE APPROVED BY THE SLD: This is the discount rate that the SLD has approved for this service.
- * FUNDING COMMITMENT DECISION: This represents the total amount of funding that the SLD is now reserving to reimburse service providers for the discounts for this service through June 30, 2000. This figure may be different from the Estimated Total Annual Pre-Discount Cost (Col. 10 of Item 15/16) times the Percentage Discount (Col. 11 of Item 15/16) in the 471 application. It may be lower because of an adjustment determined appropriate by the SLD, such as of the discount percentage, or a denial of discounts and, if so, the accompanying comment will explain this difference. The difference may also reflect a reduction from the request level made necessary by overall funding limitations, in which case the "Funding Status" above will indicate "Partially Funded" or "Unfunded". Whatever amount is listed here, it is important that you and the service provider both recognize that the SLD should be invoiced and the SLD may direct disbursement of discounts on only eligible, approved services actually rendered.
- * FUNDING COMMITMENT DECISION EXPLANATION: This entry may appear to amplify the comment in the "Funding Commitment Decision", if the discount request for this service is denied for reasons other than "Unfunded" or if the SLD determined that some adjustment to the request level was appropriate.

FUNDING COMMITMENT REPORT FOR APPLICATION NUMBER: 0000136284

Funding Request Number: 0000205365 Funding Status: Unfunded or Denied

SPIN: 143000893 Service Provider Name: Nextel West Corp.

Provider Contract Number: T

Services Ordered: Telecommunications Services

Earliest Possible Effective Date of Discount: 07/01/1999

Contract Expiration Date: N/A

Pre-discount Cost: \$34,764.00

Discount Percentage Approved by the SLD: N/A

Funding Commitment Decision: ~~\$0.00~~ - Incl. svcs./ or product(s)

Funding Commitment Decision Explanation: 30% or more of this FRN includes a request for phones, which are ineligible products based on program rules.



UNIVERSAL SERVICE
ADMINISTRATIVE CO.

SCHOOLS AND LIBRARIES DIVISION

Box 125 – Correspondence Unit
100 South Jefferson Road
Whippany, New Jersey 07981

Administrator's Decision on Appeal - Funding Year 1999-2000

March 22, 2000

Steven Wester
Rockwood School District R 6
111 E. North Street
Eureka, MO 63025-1229

Re: Billed Entity Number: 136875
 Application Number: 136284
 Funding Request Number(s): 205365
 Your Correspondence Received: August 23, 1999

After thorough review and investigation of your appeal, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company has resolved your appeal seeking approval of additional discounts for the second program year. This letter addresses our decision concerning each Funding Request Number that was included in your letter of appeal for the Application Number cited above. If your letter of appeal addressed more than one Application Number, a separate letter will be issued to inform you of our decision on the appeal of each Application Number.

Funding Request Number: 205365
Decision on Appeal: Denied in full

Denial Reason(s):

- Applicant documentation supports that this is not a request for phones, but for cellular service. This FRN must still be denied because more than 30% of this request is for cellular service to be used by grounds/maintenance, resource officers, computer center, and food services which are ineligible uses of this service according to program rules.

If you feel further examination of your application is in order, you may file an appeal with the Federal Communications Commission, Office of the Secretary, 445 12TH Street, SW, Room TW-A325, Washington, DC 20554. Before preparing and submitting your appeal, please be sure to review the FCC rules concerning the filing of an appeal of an Administrator's Decision, which are posted to the SLD Web Site at <www.sl.universalservice.org>. You must file your appeal with the FCC no later than 30 days from the date of the issuance of this letter, in order for your appeal to be timely filed.

You should now move ahead, if you haven't already done so, with your Form 486 and related post-commitment arrangements for services for which funds have been committed and services have begun to flow. We thank you for your continued support, patience, and cooperation during the appeal process.

Schools and Libraries Division
Universal Service Administrative Company